

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	
)	
V.)	Criminal No. 15-36E
)	
ELIZABETH MCMAHAN)	

DEFENDANT'S MOTION TO MODIFY TRAVEL AUTHORIZATION

AND NOW, comes the defendant, Elizabeth McMahan, by her attorney, and with respect to the above captioned matter, she represents the following:

1. Incorporated herein by reference is the Unopposed Motion to Travel which Elizabeth McMahan filed on December 3, 2018.

2. On December 4, 2018, the Court granted that Motion. The Order authorizing Elizabeth McMahan's travel includes two trips to and from Richmond Virginia.

3. The within Motion refers only to the second trip, i.e. the one beginning on December 27, 2018 and ending on December 28, 2018.

4. At 1:20 p.m. on December 28, 2018, Elizabeth McMahan telephoned undersigned counsel from Richmond, Virginia and reported that a "leg" of her return flight to Erie, PA was cancelled. She also reported that the next available return flight will occur on December 29, 2018. Elizabeth McMahan

did reserve a seat for herself on this December 29, 2018 flight.

5. Under the terms of the flight plan on December 29, 2018, Elizabeth McMahan is scheduled to land in Erie, PA on 5:24 p.m. that day.

WHEREFORE, the defendant Elizabeth McMahan respectfully requests that the Court modify the Order of Court dated December 4, 2018, and extend the "window" during which Elizabeth McMahan may be outside of the Western District of Pennsylvania from December 28, 2018 until December 29, 2018.

Respectfully submitted,

s/ Thomas Livingston
Thomas Livingston
Assistant Federal Public Defender
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